

From: [Mickey Edmondson](#)
To: [Larry Peyton](#); [Dean Lewis](#)
Cc: [Moore, Gary](#); (b) (6)
Subject: Fw: RE: RE: CES ASTs Removal
Date: Tuesday, April 07, 2015 12:53:56 PM
Attachments: [image001.png](#)
[rg-480.pdf](#)

Larry,
 See the attachment.

Michael "Mickey" Edmondson
 18604 East F.M. -1097
 Willis, Texas 77378
 936.900.1475 cell
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Sent: Tuesday, March 31, 2015 at 9:10 AM
From: "Terry Andrews"
To: "Mickey Edmondson"
Subject: RE: RE: CES ASTs Removal

Mickey,

I checked with Nicole Bealle and she said that the ASTs should be empty and not contain any liquids during move/transport.

Thank you,

Terry

From: Mickey Edmondson [mailto:environmental@usa.com]
Sent: Tuesday, March 31, 2015 5:39 AM
To: Terry Andrews
Subject: Re: RE: CES ASTs Removal

Terry,

Thanks for the Regulatory Guidance Document (RG480). The ASTs are RCRA Clean, will be shipped to permitted disposal facility (Lonestar Ecology) for reuse. You will be notified prior to implementing the removal activities and provided a copy of the Bankruptcy Court's approval post the Trustee's receipt thereof.

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Sent: Monday, March 30, 2015 at 1:16 PM
From: "Terry Andrews" <Terry.Andrews@tceq.texas.gov>

To: "Mickey Edmondson" <environmental@usa.com>

Subject: RE: CES ASTs Removal

Mickey,

By "RCRA clean" do you mean "RCRA empty" status? Please see that attached guidance for dealing with empty waste containers. Note that there are additional requirements if a container stored an acutely hazardous material. Is this being done through the bankruptcy trustee?

Thanks,

Terry

Terry Andrews, P.G., Team Leader

Remediation Division

Texas Commission on Environmental Quality

Ph: 713.767.3560



From: Mickey Edmondson [mailto:environmental@usa.com]

Sent: Monday, March 30, 2015 11:47 AM

To: Terry Andrews

Cc: Gary Moore; Dean Lewis

Subject: CES ASTs Removal

Terry,

Lonestar Ecology is entertaining the possibility of removing the ASTs located at the CES site and erecting the ASTs at their facility. The EPA has completed the removal/disposal of the liquids/sludge's contained within the ASTs and have pressured washed the interiors. The ASTs currently meet the criteria for attainment of RCRA clean status and can be transported to the Lonestar facility. Therefore, other than notifying the TCEQ of Lonestar's removal activities, what are your requirements?

Michael "Mickey" Edmondson

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